

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
)	

**DEBTORS' MOTION FOR EXPEDITED CONSIDERATION OF AGREED MOTION
FOR ENTRY OF PROTECTIVE ORDER**

Debtors hereby request that the Court consider the Agreed Motion for Entry of Protective Order, which will govern the production of documents, data, and other responsive information by Congoleum Corporation ("Congoleum") pursuant to a Rule 45 subpoena served by W.R. Grace & Co., on an expedited basis and rule on the Motion without the need for any hearing.

Expedited consideration and resolution is warranted because the Motion is an agreed motion between Congoleum and Grace. Further, prompt resolution of the Motion is necessary so that Congoleum may begin to product documents, data, and other responsive information as soon as possible. The information that Congoleum expects to produce is necessary to Grace's expert analysis. With supplemental expert reports due in less than two months, time is of the essence and entry of the agreed Protective Order is necessary.

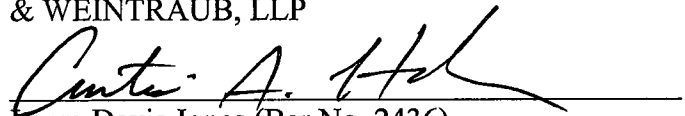
While Grace does not expect any objections to the entry of the protective order will be made, if the Court believes that an objection period is necessary, Grace respectfully

requests that the Court require any objection to be made within 5 days of the Court granting this Motion for Expedited Consideration.

WHEREFORE, W.R. Grace & Co. respectfully requests that this Court grant this motion for expedited consideration, order that any objections to the entry of the protective order be made within 5 days, and approve the motion for entry of the protective order at the Court's earliest convenience thereafter.

Dated: July 3, 2007

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